



west virginia department of environmental protection

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ENGINEERING EVALUATION / FACT SHEET

BACKGROUND INFORMATION

Application No.: R13-0119C
Plant ID No.: 001-00005
Applicant: Wolf Run Mining Company
Facility Name: Sentinel Preparation Plant
Location: Philippi, Barbour County
SIC Code: 1221 (Bituminous Coal & Lignite - Surface)
NAICS Code: 212111 (Bituminous Coal and Lignite Surface Mining)
Application Type: Modification
Received Date: September 27, 2011
Engineer Assigned: Dan Roberts
Fee Amount: \$2,000.00
Date Received: September 28, 2011
Complete Date: December 20, 2011
Applicant Ad Date: September 28, 2011
Newspaper: *The Barbour Democrat*
UTM's: Easting: 581.2 km Northing: 4339.2 km Zone: 17
Description: Modification to do the following: construct a new raw coal receiving and processing area which will consist of one crusher (CR-2), two belt conveyors (BD-15 and BC-16) and three open storage piles (OS-4, OS-5 and OS-6); construct a clean coal handling system consisting of two belt conveyors (BC-12 and BC-17), radial stacker (BC-18) and one open storage pile (OS-7); add a transfer point (TP-47) from existing refuse bin BS-2 directly to trucks for transport to the refuse disposal area; increase the maximum annual throughput of the wet wash prep plant from 3,200,000 TPY to 4,400,000 TPY; and increase the maximum annual throughput of the refuse circuit.

BACKGROUND

Anker West Virginia was originally issued a construction permit for the Sentinel Preparation Plant on November 6, 1974. Wolf Run Mining Company acquired the facility in 1991. Wolf Run Mining Company was issued modification permit R13-0119A on September 21, 2009 to construct new belt lines, transfer points, an open stockpile and a paved and unpaved haulroad. Wolf Run Mining Company was issued modification permit R13-0119B on July 19, 2011 to increase the

throughput of raw coal from 1,500,000 TPY to 3,200,000 TPY, clean coal from 1,500,000 TPY to 3,200,000 TPY, and refuse from 825,000 TPY to 1,760,000 TPY.

DESCRIPTION OF PROCESS

Wolf Run Mining Company has proposed to add a new raw coal receiving area. Trucks will transport raw coal into the facility and dump it to new open storage pile OS-4. Loaders will transfer the raw coal from OS-4 to new double roll crusher CR-2. From CR-2, refuse greater than two (2) inches will exit onto new belt conveyor BC-15 which will transfer it to new open storage pile OS-5, where it is reclaimed by a loader and loaded to trucks and hauled to the refuse pile. Also from CR-2, sized raw coal will exit onto new belt conveyor BC-16 which will transfer it to new open storage pile OS-6, where it will be pushed by a dozer to the underground feeder at existing open storage pile OS-1 and transferred to the wet wash preparation plant on belt conveyor BC-4.

Raw coal exits the mine on 54" belt conveyor BC-01. The raw coal travels on BC-01 to double roll crusher CR-1 and then into a double deck screen S-1. The coal is then transferred to 54" belt conveyor BC-02 and carried to double deck screen S-2 and then into another double deck screen S-3.

Sized coal leaving S-3 is transferred to 48" belt conveyor BC-03. BC-03 carries the sized coal to a stacking tube, which then transfers the coal to open storage pile OS-1. A dozer pushes the sized coal from OS-1 to an underground feeder. The sized coal will exit the underground feeder to 30" belt conveyor BC-04, which transfers it to the preparation plant.

Clean coal exits the preparation plant onto 36" belt conveyor BC-05, which transfers it to 36" belt conveyor BC-06 or new belt conveyor BC-19. Clean coal is carried by BC-06 to a stacking tube and into open storage pile OS-2. A dozer pushes the clean coal from OS-2 to an underground feeder, which transfers it onto 60" belt conveyor BC-07. BC-07 then transfers it to storage bin BS-1. Clean coal is then transferred to railroad cars for delivery.

New belt conveyor BC-19 will transfer the middlings to new conveyor BC-17 and then to new radial stacking conveyor BC-18, which will deposit them to new open storage pile OS-7. From OS-7, a dozer will push the middlings to an underground feeder through a new tunnel and onto extended belt conveyor BC-7.

Refuse from double deck screen S-3 drops onto 42" belt conveyor BC-09. BC-09 transfers the refuse to 36" belt conveyor BC-08. Refuse exiting the preparation plant will also enter onto BC-08. BC-08 will carry all refuse to storage bin BS-2.

Refuse will exit bin BS-2 via three separate transfer points. Approximately 300,000 tons per year will exit bin BS-2 onto 24" belt conveyor BC-10. The refuse will be transferred from BC-10 to 24" belt conveyor BC-11 and then to another 24" belt conveyor BC-12. The refuse is then transferred to another 24" belt conveyor BC-13, which is attached to a radial stacker. Refuse will then drop onto open stockpile OS-3 and will be removed from OS-3 via a loader onto trucks. The trucks will exit the site using unpaved and paved access roads.

The remainder of the bin BS-2 refuse will exit at new transfer point TP-47 directly into trucks to be hauled to the refuse expansion or on 36" belt conveyor BC-14. BC-14 will carry the refuse to storage bin BS-3. Refuse will exit bin BS-3 to a pan and will then be spread to the refuse pile.

The facility shall be constructed and operated in accordance with the following equipment and control device information taken from permit applications R13-0119C, R13-0119B, R13-0119A and R13-0119 and any amendments thereto:

Equipment ID #	Date of Construction, Reconstruction or Modification	Emission Unit Description	Design Capacity		Control Device ²
			TPH	TPY	
Deep Mine Raw Coal Circuit					
BC-1	M 2011	54" Raw Coal Belt Conveyor - transfers raw coal from from the deep mine to CR-1	1,350	3,600,000	PE
CR-1	M 2011	McLanahan 30" x 60" Heavy Duty Double Roll Crusher - HDDR3060001 - receives raw coal from BC-1, crushes it and then drops it to S-1	1,350	3,600,000	FE
S-1	M 2011	2-8' x 16' Double Deck Incline Vibrating Screen - Serial No. 4701 - receives crushed raw coal from CR-1, classifies it and then drops it to BC-2	1,350	3,600,000	FE
BC-2	M 2011	54" Raw Coal Belt Conveyor - receives sized raw coal from S-1 and transfers it to S-2	1,350	3,600,000	PE
S-2	M 2011	8' x 16' Double Deck Incline Vibrating Screen - Serial No. 4702 - receives sized raw coal from BC-2, classifies it and then drops it to S-3	1,350	3,600,000	FE
S-3	M 2011	8' x 16' Double Deck Incline Vibrating Screen - Serial No. 4702 - receives sized raw coal from S-2, classifies it and then drops the pass through coal to BC-3and the oversize refuse to BC-9 (see Refuse Circuit below)	1,350	3,600,000	FE
BC-3	M 2011	48" Raw Coal Belt Conveyor - receives sized raw coal from S-3 and transfers it to OS-1	1,350	3,600,000	PE
OS-1	M 2011	Raw Coal Open Storage Pile with a Stacking Tube - 10,431 ton capacity - 31,416 ft ² base area - receives raw coal from BC-3 and OS-6 via a dozer (see Trucked Raw Coal Circuit below), stores it and then an underground feeder reclaims it to BC-4	1,350 in 600 out	4,400,000	WS
BC-4	M 2011	30" Raw Coal Belt Conveyor - receives sized raw coal from OS-1 and transfers it to the wet wash prep plant	550	4,400,000	PE
Trucked Raw Coal Circuit					
OS-4	C 2011	Raw Coal Open Storage Pile - 1,683 ton capacity - 10,000 ft ² base area - receives raw coal from trucks, stores it and then an endloader transfers it to CR-2	360	800,000	WS
CR-2	C 2011	Tesab Double Roll Crusher - 1012T - receives raw coal from OS-4 via an endloader, crushes it and the oversize refuse drops to BC-15 while the sized raw coal drops to BC-16	600	3,600,000	PE, WS
BC-15	C 2011	Clean Coal Belt Conveyor - receives +2" oversize refuse from CR-2 and transfers it to OS-5	360	800,000	PE

Equip- ment ID #	Date of Construction, Reconstruction or Modification	Emission Unit Description	Design Capacity		Control Device ²
			TPH	TPY	
OS-5	C 2011	Oversize Refuse Open Storage Pile - 1,683 ton capacity - 10,000 ft ² base area - receives oversize refuse from BC-15, stores it and then an endloader loads it to trucks	360	400,000	WS
BC-16	C 2011	Clean Coal Belt Conveyor - receives sized raw coal from CR-2 and transfers it to OS-6	360	800,000	PE
OS-6	C 2011	Sized Raw Coal Open Storage Pile - 1,683 ton capacity - 10,000 ft ² base area - receives sized raw coal from BC-16, stores it and then a dozer pushes it to the underground feeder at OS-1	360	800,000	WS
Clean Coal Circuit					
BC-5	M 2011	36" Clean Coal Belt Conveyor - receives clean coal from the wet wash prep plant and transfers it to BC-19 or BC-6 (see below)	800	4,400,000	PE
BC-19	C 2011	Clean Coal Belt Conveyor - receives clean coal from BC-5 and transfers it to BC-17	360	800,000	PE
BC-17	C 2011	Clean Coal Belt Conveyor - receives clean coal from BC-12 and transfers it to BC-18	360	800,000	PE
BC-18	C 2011	Clean Coal Radial Stacker - receives clean coal from BC-17 and transfers it to OS-7	360	800,000	PE
OS-7	C 2011	Clean Coal Open Storage Pile - 1,683 ton capacity - 10,000 ft ² base area - receives clean coal from BC-18, stores it and then a dozer pushes it into an underground feeder which reclaims it to BC-7 (see below)	360	800,000	WS
BC-6	M 2011	36" Clean Coal Belt Conveyor - receives clean coal from BC-5 and transfers it to OS-2	800	3,600,000	PE
OS-2	M 2011	Clean Coal Open Storage Pile with a Stacking Tube - 10,431 ton capacity - 31,416 ft ² base area - receives clean coal from BC-6, stores it and then a dozer pushes it into an underground feeder which reclaims it to BC-7	800 in 2,500 out	3,600,000	WS
BC-7	M 2011	60" Clean Coal Belt Conveyor - receives clean coal from OS-7 and OS-2 and transfers it to BS-1	2,500	4,400,000	PE
BS-1	M 2011	Clean Coal Loadout Bin with a Telescopic Chute - 161 ton capacity - receives clean coal from BC-7 and then loads it to rail cars	2,500	4,400,000	FE
Refuse Circuit					
BC-9	C 2008	42" Belt Conveyor - receives oversize refuse from S-3 (see Deep Mine Raw Coal Circuit above) and transfers it to BC-8	244	300,000	PE
BC-8	M 2011	36" Belt Conveyor - receives oversize refuse from S-3 and refuse from the wet wash prep plant and transfers it to BS-2	400	2,280,000	PE
BS-2	M 2011	Refuse Bin - 161 ton capacity - receives refuse from BC-8 and drops it to BC-10, BC-14 or trucks for transport to the disposal area	400	2,280,000	FE
BC-10	C 2008	24" Belt Conveyor - receives refuse from BS-2 and transfers it to BC-11	244	300,000	PE
BC-11	C 2008	24" Belt Conveyor - receives refuse from BC-10 and transfers it to BC-12	244	300,000	PE

Equip- ment ID #	Date of Construction, Reconstruction or Modification	Emission Unit Description	Design Capacity		Control Device ²
			TPH	TPY	
BC-12	C 2008	24" Belt Conveyor - receives refuse from BC-11 and transfers it to BC-13	244	300,000	PE
BC-13	C 2008	24" Belt Conveyor - receives refuse from BC-12 and transfers it to OS-3	244	300,000	PE
OS-3	C 2008	Refuse Open Storage Pile - 1,683 ton capacity - 10,000 ft ² base area - receives refuse from BC-13, stores it and then an endloader loads it to trucks for shipment to the disposal area	244	300,000	WS
BC-14	M 2011	36" Belt Conveyor - receives refuse from BS-2 and transfers it to BS-3	400	1,980,000	PE
BS-3	M 2011	Refuse Bin - 161 ton capacity - receives refuse from BC-14 and then drops it to pans for shipment to the disposal area	400	1,980,000	FE

¹ In accordance with 40 CFR 60 Subpart Y, coal processing and conveying equipment, coal storage systems, and coal transfer and loading systems constructed, reconstructed, or modified after October 27, 1974 but on or before April 28, 2008 shall not discharge gases which exhibit 20 percent opacity or greater. Coal processing and conveying equipment, coal storage systems, and coal transfer and loading systems constructed, reconstructed, or modified after April 28, 2008 shall not discharge gases which exhibit 10 percent opacity or greater. For open storage piles constructed, reconstructed, or modified after May 27, 2009, the permittee shall prepare and operate in accordance with a fugitive coal dust emissions control plan that is appropriate for site conditions.

² Control Device Abbreviations: FE - Full Enclosure; PE - Partial Enclosure; PW - Partial Enclosure with Water Sprays; WS - Water Sprays; and N - None.

SITE INSPECTION

This facility is inspected on a regular basis by the DAQ's Compliance and Enforcement Section from the North Central Regional Office. A copy of the application will be forwarded to the North Central Regional Office and remain on file. Ms. Lou Ann Lee performed a partial on-site inspection on January 13, 2010. No visual emissions were observed, only steam coming from the ground entrance. No loading was observed at the time of inspection. The facility was given a Status Code 30 - Facility in Compliance.

Mr. Brian Tephabock performed a pre-construction site inspection for application R13-0119A on August 14, 2008. The facility was found to be in compliance.

Directions from Charleston are to take Interstate I-79 North, take the WV-20 Exit 115 toward Stonewood/Nutter Fort and travel 0.3 miles, turn right onto State Route 20 South and travel 4.0 miles, State Route 20 becomes State Route 57 East and travel 11.9 miles, turn left onto US Route 119 North and travel 5.5 miles, turn slight left onto State Route 76 North (Galloway Rd.) and the facility is located 200 yards north of this intersection.

ESTIMATE OF EMISSIONS BY REVIEWING ENGINEER

Fugitive emission calculations for continuous and batch drop operations, transfer points, crushing and screening, storage piles, and paved and unpaved haulroads are based on AP-42 Fifth Edition "Compilation of Air Pollution Emission Factors", Volume 1. Control efficiencies were

applied based on “Calculation of Particulate Matter Emission - Coal Preparation Plants and Material Handling Operations.” The emission factors for crushing/breaking and screening operations were obtained from the Air Pollution Engineering Manual - Air & Waste Management Association - June 1992. The calculations were performed by the applicant using the DAQ’s G10-C Excel spreadsheet and were checked for accuracy and completeness by the writer.

The proposed modifications will result in an increase in the potential to discharge controlled emissions from point sources of 134.22 pounds per hour and 67.77 TPY of particulate matter (PM), of which 55.19 pounds per hour and 24.03 TPY will be particulate matter less than 10 microns in diameter (PM₁₀). The writer used the DAQ’s G10-C Excel spreadsheet to calculate the increase in emissions as a result of the proposed modifications and a copy has been attached. Refer to the following table for a summary of the proposed increase in emissions:

Proposed Increase in Emissions - Wolf Run Mining Company R13-0119C	Controlled PM Emissions		Controlled PM ₁₀ Emissions	
	lb/hour	TPY	lb/hour	TPY
Fugitive Emissions				
Stockpile Emissions	0.06	0.28	0.03	0.13
Unpaved Haulroad Emissions	45.20	44.86	13.34	13.24
Paved Haulroad Emissions	0.00	0.00	0.00	0.00
<i>Fugitive Emissions Total</i>	<i>45.26</i>	<i>45.14</i>	<i>13.37</i>	<i>13.37</i>
Point Source Emissions				
Equipment Emissions	84.60	16.80	13.76	7.90
Transfer Point Emissions	4.36	5.83	2.06	2.76
<i>Point Source Emissions Total (PTE)</i>	<i>88.96</i>	<i>22.63</i>	<i>41.82</i>	<i>10.65</i>
FACILITY EMISSIONS TOTAL	134.22	67.77	55.19	24.03

The proposed modification will result in the following new estimated facility-wide potential to discharge controlled emissions:

New Facility-wide Emissions Summary - Wolf Run Mining Company R13-0119C	Controlled PM Emissions		Controlled PM ₁₀ Emissions	
	lb/hour	TPY	lb/hour	TPY
Fugitive Emissions				
Stockpile Emissions	0.18	0.79	0.08	0.37
Unpaved Haulroad Emissions	103.80	166.85	30.64	49.25
Paved Haulroad Emissions	5.85	5.85	1.14	1.14
<i>Fugitive Emissions Total</i>	<i>109.83</i>	<i>173.49</i>	<i>31.86</i>	<i>50.76</i>
Point Source Emissions				
Equipment Emissions	90.00	119.20	42.30	56.02
Transfer Point Emissions	12.59	15.33	5.95	7.25
<i>Point Source Emissions Total (PTE)</i>	<i>102.59</i>	<i>134.53</i>	<i>48.25</i>	<i>63.27</i>
FACILITY EMISSIONS TOTAL	212.42	308.02	80.12	114.03

REGULATORY APPLICABILITY

NESHAPS and PSD have no applicability to the proposed facility. The proposed modification of a coal processing plant will be subject to the following state and federal rules:

45CSR5 To Prevent and Control Air Pollution from the Operation of Coal Preparation Plants and Coal Handling Operations

The facility is subject to the requirements of 45CSR5 because it meets the definition of “Wet wash coal preparation plant” found in subsection 45CSR5.2.4. The facility should be in compliance with Section 3 (less than 20% opacity) and Section 6 (fugitive dust control system and dust control of the premises and access roads) when the particulate matter control methods and devices proposed within application R13-0119C and any amendments thereto are in operation.

45CSR13 Permits for Construction, Modification, Relocation and Operation of Stationary Sources of Air Pollutants, Notification Requirements, Temporary Permits, General Permits, and Procedures for Evaluation

The proposed modification is subject to the requirements of 45CSR13 because it will result in an increase in potential controlled emissions greater than six (6) pounds per hour and ten (10) tons per year of a regulated air pollutant (PM and PM₁₀) and will involve the construction and modification of existing equipment subject to NSPS Subpart Y. The applicant has submitted an application for a modification permit. The applicant published a Class I legal advertisement in *The Barbour Democrat* on September 28, 2011 and submitted \$1,000 for the application fee and \$1,000 for the NSPS fee.

45CSR16 Standards of Performance for New Stationary Sources

40 CFR 60 Subpart Y: Standards of Performance for Coal Preparation and Processing Plants

This wet wash coal preparation plant is subject to 40 CFR 60 Subpart Y because it was constructed and will be modified after October 24, 1974 and processes more than 200 tons of coal per day. The proposed modification includes the construction of one (1) crusher, five (5) belt conveyors, four (4) open storage piles and modification of existing pieces of equipment which are defined as affected facilities in 40 CFR 60 Subpart Y. Therefore, the proposed construction is subject to 45CSR16, which incorporates by reference 40 CFR 60 Subpart Y - Standards of Performance for Coal Preparation Plants.

The facility should be in compliance with the following: Section 254(a) (less than 20% opacity for coal processing and conveying equipment, coal storage systems, or coal transfer and loading systems processing coal constructed, re-constructed or modified on or before April 28, 2008); and Section 254(b) (less than 10% opacity for coal processing and conveying equipment, coal storage systems, or coal transfer and loading systems processing coal constructed, re-constructed or modified after April 28, 2008) when the particulate matter

control methods and devices proposed are in operation.

The owner or operator of an open storage pile, which includes the equipment used in the loading, unloading, and conveying operations of the affected facility, constructed, reconstructed, or modified after May 27, 2009, must prepare and operate in accordance with a submitted fugitive coal dust emissions control plan that is appropriate for the site conditions. The fugitive coal dust emissions control plan must identify and describe the control measures the owner or operator will use to minimize fugitive coal dust emissions from each open storage pile. The plan must be submitted to the Director prior to startup of the new, reconstructed or modified open storage pile.

45CSR30 Requirements for Operating Permits

In accordance with 45CSR30 Major Source Determination, this wet wash coal preparation plant is not listed in 45CSR30 subsection 2.26.b as one of the categories of stationary sources which must include fugitive emissions (open storage piles constructed or modified on or before May 27, 2009 and haulroads) when determining whether it is a major stationary source for the purposes of § 302(j) of the Clean Air Act. The facility's new potential to emit will be 63.27 TPY for PM₁₀ (open storage piles constructed or modified after May 27, 2009 and point sources combined), which is less than the 45CSR30 threshold of 100 TPY of a regulated air pollutant used to define a major stationary source. Therefore, the facility will be subject to 45CSR30 and remain classified as a Title V deferred non-major source.

The proposed modification of a wet wash coal preparation plant will not be subject to the following state and federal rules:

45CSR14 Permits for Construction and Major Modification of Major Stationary Sources of Air Pollution for the Prevention of Significant Deterioration

In accordance with 45CSR14 Major Source Determination, this wet wash coal preparation plant is not one of the 100 TPY stationary sources listed under the definition of "Major Stationary Source" in subsection 2.43.a. Therefore, it must have the potential to emit 250 TPY or more of any regulated pollutant to meet the definition of a major source in subsection 2.43.b. At the end of subsection 2.4.3, this facility is not listed in Table 1 - Source Categories Which Must Include Fugitive Emissions. So, fugitive emissions (from open storage piles constructed or modified on or before May 27, 2009 and haulroads) are not included when determining major stationary source applicability. The facility's new potential to emit will be 134.53 TPY for PM (open storage piles constructed or modified after May 27, 2009 and point sources combined), which is less than the 45CSR14 threshold of 250 TPY for a regulated air pollutant used to define a major stationary source. Therefore, the proposed modification is not subject to the requirements set forth within 45CSR14.

TOXICITY OF NON-CRITERIA REGULATED POLLUTANTS

A toxicity analysis was not performed because the pollutants being emitted from this facility

are PM (particulate matter) and PM₁₀ (particulate matter less than 10 microns in diameter), which are non-toxic pollutants.

AIR QUALITY IMPACT ANALYSIS

Air dispersion modeling was not performed due to the nature and extent of the modifications proposed for this existing facility. This facility is located in Barbour County, WV, which is currently in attainment for PM (particulate matter) and PM₁₀ (particulate matter less than 10 microns in diameter). This facility is not a major source as defined by 45CSR14, therefore, an air quality impact analysis is not required.

MONITORING OF OPERATIONS

For the purposes of determining compliance with maximum throughput limits, the applicant shall maintain certified daily and monthly records. Example forms are included as Appendices A through C to Permit R13-0119C. Example forms for tracking the amount of water applied through fixed water sprays and the water truck are included as Appendices D and E to Permit R13-0119C. An example form for the Monthly Opacity Testing is included as Appendix F to Permit R13-0119C. The Certification Of Data Accuracy statement shall be completed within fifteen (15) days of the end of the reporting period. These records shall be maintained on site by the permittee for at least five (5) years and shall be made available to the Director of the Division of Air Quality or his or her duly authorized representative upon request.

The owner or operator of an open storage pile, which includes the equipment used in the loading, unloading, and conveying operations of the affected facility, constructed, reconstructed, or modified after May 27, 2009, must prepare and operate in accordance with a submitted fugitive coal dust emissions control plan that is appropriate for the site conditions. The fugitive coal dust emissions control plan must identify and describe the control measures the owner or operator will use to minimize fugitive coal dust emissions from each open storage pile. The plan must be submitted to the Director prior to startup of the new, reconstructed or modified open storage pile.

CHANGES TO CURRENT PERMIT R13-0119B

- Construct a new raw coal receiving and processing area which will consist of one crusher (CR-2), two belt conveyors (BD-15 and BC-16) and three open storage piles (OS-4, OS-5 and OS-6)
- Construct a clean coal handling system consisting of two belt conveyors (BC-12 and BC-17), radial stacker (BC-18) and one open storage pile (OS-7)
- Add a transfer point (TP-47) from existing refuse bin BS-2 directly to trucks for transport to the refuse disposal area
- Increase the maximum annual throughput of the wet wash prep plant from 3,200,000 TPY to 4,400,000 TPY
- Increase the maximum annual throughput of the refuse circuit

RECOMMENDATION TO DIRECTOR

The information contained in this modification permit application indicates that compliance with all applicable regulations should be achieved when all of the proposed particulate matter control methods are in operation. Due to the location, nature of the process, and control methods proposed, adverse impacts on the surrounding area should be minimized. Therefore, the granting of a permit to Wolf Run Mining Company for the modification of their Sentinel Preparation Plant located in Philippi, Barbour County, WV is hereby recommended.

Daniel P. Roberts, Engineer Trainee
NSR Permitting Section

December 28, 2011
Date